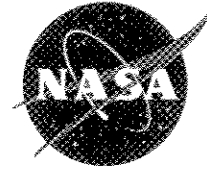


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



October 26, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the National Japanese American Memorial Foundation 10th Anniversary Gala Luncheon on November 4, 2010

On November 4, 2010, the National Japanese American Memorial Foundation (NJAMF), a national 501(c)(3) not-for-profit organization working to preserve Japanese American History, will sponsor a luncheon at the JW Marriott in Washington, DC from 11:30 AM – 2:00 PM. The luncheon is to honor retired Supreme Court Justice John Paul Stevens, the National Park Service and members of the Japanese American Military Intelligence Service (MIS) during WWII in the Pacific.

Approximately 300 people have been invited to attend, including industry representatives, state and local officials, and representatives of the media, the legislative branch, judiciary, employees of other Federal agencies, as well as the general public. The estimated cost of the event, including all food and beverages, is approximately \$50 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to discuss NASA's programs and plans with other attendees.

NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone